



445 Hamilton Avenue, 14th Floor  
White Plains, New York 10601  
T 914 761 1300  
F 914 761 5372  
cuddyfeder.com

October 7, 2024

Hon. Lorna G. Schofield, U.S. District Judge  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

Re: Edery Herrera v. Shen Yun Performing Arts, Inc.  
24 Civ. 6443 (LGS)

Dear Hon. Judge Schofield:

We represent the defendant and by this joint application by both plaintiffs counsel and the undersigned respectfully request that the time for the scheduling conference (presently scheduled for October 16, 2024) and joint submission be adjourned until after the defendant has either answered the complaint or moved to dismiss in accordance with the court's rules.

The reason for this joint application is that defense counsel has just been retained and the defendant's time to answer or move is October 8, 2024 and on consent of plaintiffs counsel has been extended to November 8, 2024.

Plaintiff's counsel and Defense counsel also respectfully request that the parties date for submission of the respective letters setting forth their respective positions be adjourned from October 9 to a new date at the court's convenience after the submission of defendant's answer or the court's decision on defendant's motion to dismiss.

Thank you for your consideration.

Respectfully submitted,

Joshua J. Grauer, Esq.  
Cuddy & Feder LLP  
445 Hamilton Avenue, 14<sup>th</sup> Floor  
White Plains, NY 10601

Jeffrey M. Gottlieb, Esq.  
Gottlieb & Associates PLLC  
150 East 18<sup>th</sup> Street, Suite PHR  
New York, NY 10003

Application **GRANTED** in part and **DENIED** in part.  
The time for Defendant to answer or otherwise respond to the complaint is extended to **November 8, 2024**. The initial pretrial conference scheduled for October 16, 2024, is adjourned to **October 30, 2024, at 4:20pm**. The parties shall submit the materials described at Dkt. 6 by **October 23, 2024**. It is not the Court's practice to adjourn the initial conference to accommodate extended answer deadlines.

Dated: October 8, 2024  
New York, New York

LORNA G. SCHOFIELD  
UNITED STATES DISTRICT JUDGE